

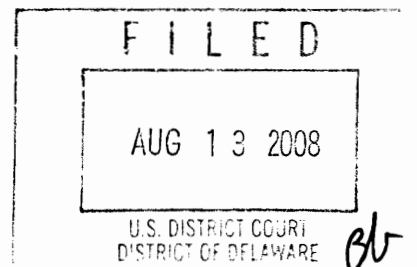
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMAS R. MILLER
Plaintiff,

Civ. No. 06-349-GMS

v.
DR. MAGGIE BAILEY AND
FIRST CORRECTIONAL MEDICAL
INC.

Defendants.



RULE 34 PRODUCTION OF DOCUMENTS AND
THINGS AND ENTRY UPON LAND FOR
INSPECTION AND OTHER PURPOSES

- (1) Plaintiff Thomas R. Miller respectfully request this Honorable Court to order the production of documents, pertaining to the medical record, for Court purposes and copy.
- (a) Scope. Any party may serve on any other party a request (1) to produce and permit the party making the request or someone acting on the requestor's behalf, to inspect and copy, any designated documents (including writings, drawings, graphs, charts, photographs, phono records, and other data compilations from which information can be obtained, translated, if necessary within the scope of Rule 26(b) Depositions and discovery.
- (2) I Plaintiff Thomas R. Miller respectfully request this Honorable Court to grant this motion for production of documents to plaintiff's medical records, from the Department of Corrections medical department.

DATED: August 11, 2008

Sincerely
Respectfully Submitted
Thomas R. Miller
THOMAS R. MILLER
JAMES T. VAUGHN
CORRECTIONAL CENTER
SMYRNA, LANDING RD
SMYRNA DE 19977